

MOULTON & GANS, P.C.

Year Established: 1997
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*Securities Fraud and
Complex Business Class Action Litigation
In Federal and State
Trial and Appellate Courts*

MEMBERS OF FIRM

STEPHEN MOULTON (1929 - 2001).

NANCY FREEMAN GANS, born Philadelphia, Pennsylvania, November 26, 1943; admitted to bar, 1970, Massachusetts; 1975, U.S. Supreme Court; 1996, U.S. District Court. *Education:* University of Rochester (B.A., with highest honors, 1965); Harvard University (J.D., 1970). Phi Beta Kappa. *Member:* Massachusetts Bar Association; Massachusetts Bar Foundation.

Areas of Concentration: Securities Fraud; Complex Litigation; Class Actions.

Moulton & Gans, P.C. specializes in class action litigation, primarily under the Private Securities Litigation Reform Act of 1995, 15 U.S.C. 78u-4 ("PSLRA"). The firm has been appointed Lead Counsel in two previous cases and Local or Liaison Counsel in at least 20 cases, working closely with leading firms in the class action litigation field.

The firm has actively participated in obtaining recoveries of over \$600 million for aggrieved class members, including at least the following settlements:

In re Raytheon Company Securities Litigation, Case No. 99-12142 (D.Mass.), (after five years of litigation) \$460 million (\$210 million in case and \$200 million in warrants from defendant Raytheon Company, and \$50 million from defendant PricewaterhouseCoopers, LLP);

In re CVS Corporation Securities Litigation, Case. No. 01-11464 (D. Mass.) \$110 million;

In re Allaire Corporation Securities Litigation, Case No. 00-11972 (D.Mass.), \$12.026 million;

Kafenbaum v. GTECH Holdings Corporation, et al., Case No. 00-413 (D.R.I.), \$10.25 million;

In re Lycos Securities Litigation, Case No. 99-10394 (D. Mass.) \$5.675 million;

In re Shiva Corporation Securities Litigation, Case No. 97-11159 (D.Mass.), \$4.35 million;

In re Number Nine Visual Technology Corporation Litigation, Case No. 96-11207 (D.Mass.), \$3 million;

In re Peritus Software Services Securities Litigation, Case No. 98-10578 (D. Mass.), \$2.8 million; and

Gorman v. Systemsoft Corp., et al., Case No. 98-10367 (D.Mass.), \$2.775 million.